



Tuesday, January 22, 2019

State Director, Bureau of Land Management, Alaska State Office
222 West 7th Ave, Mailstop 13
Anchorage, AK 99513

To Whom it May Concern,

The Alaska Chamber supports the Bureau of Land Management development of a new Integrated Activity Plan (IAP) and associated Environmental Impact State (EIS) for the 22.1 million-acre National Petroleum Reserve-Alaska (NPR-A) that is consistent with Secretarial Order 3352.

The Chamber is a non-profit founded in 1953 working to promote a positive business environment in Alaska. The Chamber is the voice of small and large business representing hundreds of employers and local chambers across Alaska. Our member companies employ over 100,000 hard-working Alaskans. We have long supported resource development that is both done in a responsible manner and brings economic opportunities to Alaska and its residents.

Below are some key points, we feel are paramount to re-open all of NPR-A's subsurface historically opened to oil and gas leasing, including transport of energy resources.

- Northeast NPR-A has historically been open to oil and gas development, exploration drilling and has occurred on these lands in the past. This land should be available for leasing, with mitigation measures which will also allow for development of energy deposits.
- The discovery and development of new oil and gas deposits will benefit local communities, Alaska, and the nation. State and local revenues derived from production will help sustain important state services to residents and diminish dependence on foreign oil.
- The current land management plan for NPR-A is inconsistent with the primary purpose of the petroleum reserve and unnecessarily emphasizes preservation over multiple use.
- The 2013 Integrated Activity Plan unnecessarily prohibits leasing and development of potentially oil-rich lands in much of Northeast NPR-A south of Teshekpuk Lake. The 3.1 million acres that were taken off the table in Northeast NPR-A was an overreach.
- Advances in technology have greatly reduced the footprint of development in the Arctic. As much as 60-plus square miles can now be developed from a single 12 to 14-acre gravel drill site.

BLM Alaska State Director



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- Experience supports the fact that development of oil and gas resources can coexist with traditional subsistence activities, cultural resources, wildlife, and the environment.
- Geologists believe that recent large oil discoveries in the Nanushuk formation indicate potential large oil deposits in the energy reserve.
- New industry activity could provide thousands of job opportunities, boost the local, state and national economies, and add new oil to TAPS.
- The IAP should allow for a year-round road system to connect local communities within NPR-A.
- Opening highly-prospective areas of NPR-A to future oil and gas lease sales while still protecting the most sensitive areas would advance BLM's "all-of-the-above" approach to energy development and help establish American energy dominance.

Please feel free to contact us with any questions you may have.

Sincerely,

Albert Fogle
Vice President

